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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re:

Case No. 12-43555 RE

**MOSTAFA MOHAMMAD YUSUF and
NASRIN AIMAQ-YUSUF,**

Chapter 13

Debtors.

**MOTION TO VALUE SECURITY OF
BANK OF AMERICA AS SUCCESSOR
TO COUNTRYWIDE HOME LOANS,
INC. AND HOUSEHOLD FINANCE
CORPORATION OF CALIFORNIA**

Debtors Mostafa Yusuf and Nasrin Aimaq-Yusuf ("Debtors") hereby move the court to value the second claim of Bank of America as successor to Countrywide Home Loans, Inc. ("Bank of America") and the third claim of Household Finance Corporation of California ("HFC") secured by a lien against Debtors' property located at 6039 Radcliff Avenue, Newark, CA 94560 ("the property").

1. This motion is based on the petition, schedules, and documents on file herein, and the Memorandum of Points and Authorities in Support of the Motion and Declaration of Debtor in Support of the Motion filed herewith.

1 2. As stated in the attached Declaration, at the time of filing,
2 Debtors' residence was worth less than the first lien against the
3 property.

4 3. Bank of America holds the second lien against the property.

5 4. HFC holds the third lien against the property.

6 Based on the foregoing, and for the reasons stated in the
7 attached Memorandum of Points and Authorities, Debtors pray that:

8 1. For purposes of Debtors' chapter 13 plan only, the court value
9 Bank of America's and HFC's liens at zero, hold that Bank of America
10 and HFC do not have a secured claim, and hold that Bank of America's
11 and HFC's liens may not be enforced, pursuant to 11 U.S.C. §§ 506 and
12 1327, FRBP 3012, and the United States Bankruptcy Court for the
13 Northern District of California's Guidelines for Avoiding Liens in
14 Individual Chapter 11 Cases and Chapter 13 Cases; and

15 2. Upon entry of a discharge in Debtors' chapter 13 case, the
16 liens shall be voided for all purposes, and upon application by
17 Debtors, the court will enter an appropriate form of judgment voiding
18 the liens.

19
20 Dated: May 18, 2012

 /s/ Anne Y. Shiau_____
 ANNE Y. SHIAU
 Attorney for Debtors